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The Honorable Marsha J. Pechman

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

JACK L. LIEBO, individually and on behalf of all
others similarly situated,

Plaintiffs,

v.

CEDAR SHAKE & SHINGLE BUREAU, a
Washington nonprofit corporation; WALDUN
FOREST PRODUCTS, LTD, a British Columbia
corporation; ANBROOK INDUSTRIES LTD, a
British Columbia corporation,

Defendants.

ZRD GROUP, LLC, individually and on behalf of
all others similarly situated,

Plaintiffs,

v.

CEDAR SHAKE & SHINGLE BUREAU, a
Washington nonprofit corporation; WALDUN
FOREST PRODUCTS, LTD, a British Columbia
corporation; ANBROOK INDUSTRIES LTD, a
British Columbia corporation, and G&R CEDAR
LTD, a British Columbia corporation,

Defendants.

STIPULATION AND [PROPOSED] ORDER TO CONSOLIDATE
CASES AND REQUEST TO JOIN CLASS ESI AGREEMENT (2:19-
CV-00288-MJP; 2:19-CV-00784-MJP) - 1

No. 2:19-cv-00288-MJP

**STIPULATION AND [PROPOSED]
ORDER TO CONSOLIDATE CASES**

AND

**REQUEST BY ZRD GROUP LLC
TO JOIN AGREEMENT ON
DISCOVERY OF
ELECTRONICALLY STORED
INFORMATION**

No. 2:19-cv-00784-MJP

KELLER ROHRBACK L.L.P.

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STIPULATION

The parties to the above-captioned actions, through their undersigned counsel, hereby stipulate to the consolidation of these actions and request that the Court order the cases consolidated in this Court for all purposes per Fed. R. Civ. P. 42(a) under *Liebo v. Cedar Shake & Shingle Bureau et al.*, Case No. 2:19-cv-00288 (W.D. Wash. Feb. 27, 2019), which is the lower case number.

In addition, in response to the Court's query of Thursday May 30, 2019 requesting notification whether ZRD Group intended to file its own ESI Order or join in the "class action ESI Agreement," Plaintiff ZRD Group, LLC, notifies the Court that it requests Joinder in the Class Action Stipulation and Proposed Order Regarding Agreement on Discovery of Electronically Stored Information, filed as Docket Entry No. 47 in *Liebo v. Cedar Shake & Shingle Bureau et al.*, No. 19-288.

DATED this 4th day of June, 2019.

KELLER ROHRBACK L.L.P.

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**STIPULATION AND [PROPOSED] ORDER TO CONSOLIDATE
CASES AND REQUEST TO JOIN CLASS ESI AGREEMENT (2:19-
CV-00288-MJP; 2:19-CV-00784-MJP) - 2**

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28 STIPULATION AND [PROPOSED] ORDER TO CONSOLIDATE
29 CASES AND REQUEST TO JOIN CLASS ESI AGREEMENT (2:19-
30 CV-00288-MJP; 2:19-CV-00784-MJP) - 3

31 **KELLER ROHRBACK L.L.P.**
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STIPULATION AND [PROPOSED] ORDER TO CONSOLIDATE
CASES AND REQUEST TO JOIN CLASS ESI AGREEMENT (2:19-
CV-00288-MJP; 2:19-CV-00784-MJP) - 4

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STIPULATION AND [PROPOSED] ORDER TO CONSOLIDATE
CASES AND REQUEST TO JOIN CLASS ESI AGREEMENT (2:19-
CV-00288-MJP; 2:19-CV-00784-MJP) - 5

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ORDER

It is hereby ORDERED, ADJUDGED, and DECREED that Case No. 2:19-cv-00288-MJP and Case No. 2:19-cv-00784-MJP are consolidated in this Court for all purposes into the lower case number, 2:19-cv-00288-MJP.

DATED

**The Honorable Marsha J. Pechman
UNITED STATES DISTRICT JUDGE**

**STIPULATION AND [PROPOSED] ORDER TO CONSOLIDATE
CASES AND REQUEST TO JOIN CLASS ESI AGREEMENT (2:19-
CV-00288-MJP; 2:19-CV-00784-MJP) - 6**

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CERTIFICATE OF SERVICE

I hereby certify that on this 4th day of June, 2019, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to all counsel of record.

s/ Mark A. Griffin
Mark A. Griffin, WSBA #16296